

MEMO ENDORSED**HISCOCK & BARCLAY LLP**The application is ☒ granted. ☐ denied.To Limited Extent.
Plt's time to file Amended Complaint
is Extended to May 18, 2015Joseph A. Murphy
Associate

Nelson S. Román, U.S.D.J.

Dated: May 8, 2015

White Plains, New York 10601

May 7, 2015Def's time to respond
is Extended to May 25, 2015
No Further ExtensionsVIA FACSIMILE (914) 390-4179Hon. Nelson S. Román
United States District Judge
United States Courthouse
300 Quarropas Street
White Plains, NY 10601Re: BDRN, LLC v. United Healthcare Of New York, Inc., Civil Action No. 15-cv-804
(NSR)

Dear Judge Román:

We write on behalf of Plaintiffs to submit a request that Plaintiffs' time to file an amended complaint in this matter be extended from May 8, 2015 to June 12, 2015 and Defendants' time to serve a responsive pleading or otherwise move be extended from June 19, 2015 to July 31, 2015. The parties and counsel have been discussing a possible resolution of this matter and would like additional time to continue to pursue those discussions.

This is the third request for such an extension. We previously requested, and the Court granted, an extension of Plaintiffs' time to file an amended complaint from April 10, 2015 to April 17, 2015, and then from April 17, 2015 to May 8, 2015, and Defendants' time to serve a responsive pleading or otherwise move from May 1, 2015 to May 29, 2015, and then from May 29, 2015 to June 19, 2015.

We recognize that the Court stated that the most recent extension would be final, but we believe that the current request is warranted under the circumstances. During the time granted under previous extensions, the parties have discussed a potential resolution and exchanged information and documentation in support of those discussions. It took considerable time for the documentation to be compiled, and it has been exchanged and is currently under review. We contemplate that additional documentation will need to be exchanged and reviewed. We believe that the additional extension will allow the parties time to facilitate that process.

Defendants join in this request.

USDC SDNY
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Hon. Nelson S. Román

May 7, 2015

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Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joseph A. Murphy". The signature is fluid and cursive, with the first name "Joseph" and last name "Murphy" clearly distinguishable.

Joseph A. Murphy

JAM

cc:

Michael H. Bernstein, Esq.

Sedgwick LLP

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